

Case 2:10-cv-10978-PJD-MJH

FILED

2011 APR -5 P 2:56

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

U.S. DIST. COURT CLERK
EAST DIST MICH
FLINT

AMERICAN UNIVERSITY OF ANTIGUA,
COLLEGE OF MEDICINE, a foreign corporation,

Plaintiff,

V

CASE No.: 2:10-cv-10978-PJD-MJH
Judge Patrick J. Duggan
Judge Michael Hluchaniuk, referral

STEVEN WOODWARD,

Defendant,

Motion for Request of Information by Court Order from Sallie Mae

Motion for Request of Information by Court Order from Sallie Mae

List of Exhibits:

Exhibit 1, Sallie Mae, Devin Hewitt October 13, 2010 letter
Exhibit 2, Nellie Mae Loan Certification, 01/06/06
Exhibit 3, Nellie Mae Loan Certification, 11/07/06
Exhibit 4, Email Sevrine Barrie, May 06, 2008
Exhibit 5, Recording of Sallie Mae refusing production of information

The Defendant requests the Court order the following information from Sallie Mae.

The Defendant requires the information for their defense against the Plaintiff's Docket 1 claims.

Information the Defendant is seeking from the NBME:

- The contract between Sallie Mae/Nellie Mae and American University of Antigua College of Medicine, AUA, allowing AUA and their students access to funds in 2006.**
- The business documentation (application, request and/or proposal) AUA delivered to Sallie Mae/Nellie Mae for access to student loans.**
- The reply Sallie Mae/Nellie Mae gave to AUA regarding the documentation (application, request and/or proposal) request for loans.**
- The correspondence Sallie Mae/Nellie Mae sent AUA canceling Sallie Mae/Nellie Mae loans.**
- 2006 Kasturba Medical College Nellie Mae Loan Certifications signed by Sevrine Barrie.(Please remove privileged/private student information i.e: Social Security Numbers, Loan Account Numbers) Retaining Student names and Total School Certification Ammounts**

The American University of Antigua College of Medicine was offering loans to their students in 2006. The students of American University of Antigua College of Medicine no longer get loans from Sallie Mae.

Devine Hewitt, from the Office of the Customer Advocate, sent Steven Woodward a letter, **Exhibit 1**, I quote:

“This letter is in response to your inquiry requesting assistance with an issue you are having with St. Joseph Mercy Oakland Hospital and The American University of Antigua.

I have researched your account and have confirmed that you have three Excel Grad Loans that are serviced by Sallie Mae. These loans were borrowed to finance your attendance at Kasturba Medical College; not American University of Antigua.”

The Nellie Mae Loan Certifications, **Exhibit 2** and **Exhibit 3**, are signed by Sevrine Barrie, Dean of Student Services and Registrar, **Exhibit 4**.

Neither of the Nellie Mae Loan Certifications, **Exhibit 2** and **Exhibit 3**, signed by the “Dean of Student Services and Registrar” for Plaintiff, make any mention of American University of Antigua College of Medicine.

This is evidence of, at least, violations of 18 U.S.C. 1341 Frauds and swindles, 18 U.S.C. 1343 Wire fraud over State and International Borders, 18 U.S.C. 1344 Bank fraud, 18 U.S.C. 1349 Attempt and conspiracy, 18 U.S.C. 1005, and 18 U.S.C. 1014 Loan and credit application fraud.

The fact that Sallie Mae has refuses, **Exhibit 5**, to aid in the production of requested documentation is evidence of involvement in a fraud scheme against students, including citizens of the United States, who attended American University of Antigua College of Medicine.

The Defendant requires the requested information to defend themselves against the Plaintiff's Claims.

Contact Information:

Sallie Mae
220 Lasley Ave.
Wilkes-Barre, PA 18706

Steven Woodward
7211 Brittwood Ln
Flint, MI 48507
(810)235-7267

A handwritten signature in black ink, appearing to read 'Steven Woodward', is written over a horizontal line.

SallieMae

www.SallieMae.com

P.O. Box 4200
Wilkes-Barre, PA 18773-4200

October 13, 2010

Mr. Steven L. Woodward
7211 Brittwood Lane
Flint, MI 48507-4623

RE: Your Student Loan Account # [REDACTED]

Dear Mr. Woodward:

This letter is in response to your inquiry requesting assistance with an issue you are having with St. Joseph Mercy Oakland Hospital and The American University of Antigua.

I have researched your account and have confirmed that you have three Excel Grad Loans that are serviced by Sallie Mae. These loans were borrowed to finance your attendance at Kasturba Medical College; not American University of Antigua. Enclosed please find copies of your promissory notes.

I hope that the information and documentation provided are helpful to you. You may contact me directly and toll-free at 888-545-4199, x89180, if you have any questions.

Sincerely,



Devin Hewitt
Office of the Customer Advocate
Sallie Mae

[REDACTED]

Enclosures

EXHIBIT 1

TRUE COPY OF THE ORIGINAL

001/001

Nellie Mae Loan Certification

App. #: 736939

Date: 01/06/06

File #: 9221

Fax: 800-931-2200

Tel.: 800-335-1900

General Student Information

Student Name: STEVEN L. WOODWARD

Academic Loan Period: From: 01/06 To: 08/06 Loan Type: MDEXCEL

Program of Study:

medicine

Amount Approved: \$ 34,397

*Medical Program of Study Includes Dental

Certification of Attendance

Academic Loan Period: From: 15-06 To: 8-25-06 Anticipated Graduation Date: 5/30/2009

Student Grade Level: A

Is student enrolled at least 1/2 time? Yes ☒ No ☐

Certification of Cost

Note: Applicant may borrow a guarantee fee in addition to the amount disbursed.

Fee: 0 %

Complete for all students:

Preferred # of disbursements this loan: 1 ☐ 2 ☒ 3 ☐ 4 ☐ Hold / Release:Preferred 1st disbursement date: 1/10/06 and amount: \$ 17,198.50 H ☐ R ☐Preferred 2nd disbursement date: 4/21/06 and amount: \$ 17,198.50 H ☐ R ☐Preferred 3rd disbursement date: / / and amount: \$ H ☐ R ☐Preferred 4th disbursement date: / / and amount: \$ H ☐ R ☐

Total School Certified Amount: \$ 34,397.00

Certification Options

Note: Participating institutions only. Call Nellie Mae for program details.

Interest Subsidy Options:

Interest subsidy flat rate.
1 2 3 4 5 6 7 8 9 10Interest subsidy %.
25 50 75 100

College / University Certification

Note: The school certified amount must not exceed the cost of attendance less other aid for the loan period.

Financial Aid Office:

KASTURBA MEDICAL COLLEGE
PO BOX 8 MANIPAL 576 119
KARNATAKA
INDIA, FC 576104

Signature and Date

Signature: SEVENE BARRIE
Name (please print)Asst. Dean of Student
Title (please print) Services

DOE Code: 008450 00

EXHIBIT 2

TR 11/07/06 11:39 AM 9:50 AM FAX 3

No. 8539 P. 1/1

Nellie Mae Loan Certification

App. #: 976417

Date: 11/07/06

File #: 9221

Fax: 866-347-0692

Tel: 800-335-1900

General Student Information

Student Name: STEVEN L. WOODWARD

Loan Type: MDEXCEL

SSN: [REDACTED]

Academic Loan Period: From: 09/06 To: 12/06

Program of Study: Medicine

Amount Approved: \$ 18,286

* Medical Programs of Study includes Dental

Certification of AttendanceAcademic Loan Period: From: 9-6-06 To: 12-26-06 Anticipated Graduation Date: 12/20/2009Student Grade Level: 4Is student enrolled at least 1/2 time? Yes ☒ No ☐**Certification of Cost**

Note: Applicant may borrow a guarantee fee in addition to the amount disbursed.

Fee: 5.000 %

Complete for all students:

Preferred # of disbursements this loan: 1 ☒ 2 ☐ 3 ☐ 4 ☐ Hold / Release:Preferred 1st disbursement date: 11/7/06 and amount: \$ 18,286 H ☐ R ☐Preferred 2nd disbursement date: 1/1 and amount: \$ H ☐ R ☐Preferred 3rd disbursement date: 1/1 and amount: \$ H ☐ R ☐Preferred 4th disbursement date: 1/1 and amount: \$ H ☐ R ☐Total School Certified Amount: \$ 18,286**Certification Options**

Note: Participating institutions only. Call Nellie Mae for program details.

Interest Subsidy Options:

Interest subsidy flat rate.
1 2 3 4 5 6 7 8 9 10Interest subsidy %.
25 50 75 100**College / University Certification**

Note: The school certified amount must not exceed the cost of attendance less other aid for the loan period.

Financial Aid Office:

KASTURBA MEDICAL COLLEGE
PO BOX 8 MANIPAL 576 119
KARNATAKA
INDIA, FC 576104

Signature and Date

SEVRINE BARRIE
Name (please print)Dean of Registration and
Title (please print)

Student Services

DOE Code: 008450 00

EXHIBIT 3

From: Sevrine Barrie [mailto:Sbarrie@AUAMED.ORG]
Sent: Tuesday, May 06, 2008 1:24 PM
To: Kelly, Bill
Subject: RE: ECFMG USMLE /Steven Woodward

Hi Bill:

Thanks for taking the time to return my call.

This is to inform you that Steven Woodward is no longer enrolled at the American University of Antigua. Thank you.

Sincerely,

Sevrine Rodrigues Barrie
Dean of Student Services and Registrar

EXHIBIT 4